

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

M. DIANE KOKEN, in her official capacity as
Insurance Commissioner of the Commonwealth
of Pennsylvania, as Liquidator of RELIANCE
INSURANCE COMPANY (IN LIQUIDATION)
1311 Strawberry Square
Harrisburg, Pennsylvania 17120

Plaintiff,

-v-

GPC INTERNATIONAL, INC.

Defendant.

No. 05 CV 223 (SLR)

GPC INTERNATIONAL, INC.

Third-Party Plaintiff

-v-

ZURICH-AMERICAN INSURANCE
COMPANY

Third-Party Defendant.

**DEFENDANT AND THIRD-PARTY PLAINTIFF'S NOTICE OF DEPOSITION
OF THIRD-PARTY DEFENDANT ZURICH-AMERICAN INSURANCE
COMPANY PURSUANT TO RULE 30(b)(6), FED. R. CIV. P.**

PLEASE TAKE NOTICE THAT, pursuant to Rule 30(b)(6) of the Federal Rules
of Civil Procedure, Defendant and Third-Party Plaintiff GPC International, Inc. ("GPC")

will take the deposition of Third-Party Defendant Zurich American Insurance Company (“Zurich”) on May 11, 2006, at 9:30 a.m., before a person authorized by law to administer oaths. The deposition will take place at the offices of Bouchard, Margules & Friedlander, P.A., 222 Delaware Avenue, Suite 1400, Wilmington, Delaware, 19801, and will be recorded stenographically. You are invited to attend and cross-examine.

In accordance with Rule 30(b)(6), Zurich is advised of its duty to designate one or more of its officers, directors, or other persons who consent to testify on its behalf, to testify on the following subjects:

1. Each claim submitted to Zurich with respect to any accident or injury incurred or alleged to have been incurred by Frank Jamaica (“Jamaica Accident”), arising, or alleged to arise, out of his employment by Plan Hold Corporation (“Plan Hold”), including, but not limited to, any worker’s compensation claim, and claim nos. 2080010263 and 208006987.
2. The reason(s) for each rejection by Zurich of any claim submitted to Zurich with respect to any Jamaica Accident, including, but not limited to, any worker’s compensation claim, and claim nos. 2080010263 and 208006987.
3. The contents of each file maintained by Zurich, concerning each claim submitted to Zurich with respect to any Jamaica Accident, including, but not limited to, any worker’s compensation claim, and claim nos. 2080010263 and 208006987.
4. The communications between (i) Zurich and (ii) Plaintiff, GPC, Reliance Insurance Company (“Reliance”), any insurance broker, Jamaica, or California Insurance Guaranty Association (“CIGA”), concerning each claim submitted to Zurich with respect

to any Jamaica Accident, including, but not limited to, any worker's compensation claim and claim nos. 2080010263 and 208006987.

5. CIGA's handling of any of Jamaica's worker's compensation claims.

6. The treatments or therapy given to, or surgery performed on, Jamaica during the period January 1, 1995 to the Present in connection with injuries allegedly sustained by Jamaica as an employee of Plan Hold.

7. Each doctor's evaluation, examination, or diagnosis of any actual or claimed injury suffered or incurred by Jamaica during the period January 1, 1995 to the present.

8. Each automobile accident in which Jamaica was involved during the period from January 1, 1995 to the Present, including, but not limited to, any and all injuries suffered or allegedly suffered by Jamaica as a result of such accident.

9. The medical expenses incurred by Jamaica, Reliance, CIGA, or GPC, arising out of any actual or claimed injury suffered or incurred by Jamaica during the period January 1, 1995 to the Present, including, but not limited to, the expenses for the treatments given to, surgeries performed on, and medical examination of Jamaica.

10. The payments made or agreed to be made by Reliance or CIGA to Jamaica in connection with any workers' compensation claim made by or on behalf of Jamaica, arising out of his employment by Plan Hold.

11. Each proceeding, petition, or application brought by CIGA against Zurich or Zurich-American Insurance Group, seeking a monetary contribution by Zurich or Zurich-American Insurance Group to CIGA for payments or expenditures made or incurred by CIGA for any Jamaica Accident or worker's compensation claim made by Jamaica.

BOUCHARD MARGULES & FRIEDLANDER, P.A.

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Dated: May 2, 2006

Attorneys for Defendant and Third-Party Plaintiff
GPC International, Inc.